

EXHIBIT 2

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December 4, 2008

VIA ECF and FEDEX

Honorable Marilyn D. Go
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Weiss, et al. v. National Westminster Bank Plc*, 05-cv-4622 (CPS)(MDG)
 Applebaum, et al. v. National Westminster Bank Plc, 07-cv-916 (CPS)(MDG)
 Strauss, et al. v. Crédit Lyonnais, S.A., 06-cv-702 (CPS)(MDG)
 Wolf, et al. v. Crédit Lyonnais, S.A., 07-cv-914 (CPS)(MDG)**

Dear Judge Go:

On behalf of all parties, we are submitting with this letter the parties' stipulated proposals for scheduling orders to govern all four of the above-referenced matters for the Court's approval. As Your Honor will note, the parties propose placing the Strauss and Wolf lawsuits against Credit Lyonnais on one schedule, and the Weiss and Applebaum lawsuits against National Westminster Bank on a second schedule. They further propose that, under each schedule, the parties will first complete all proceedings concerning liability issues, through summary judgment motion practice and trial, and then, as appropriate, the parties will complete proceedings concerning damages issues, subject to possible adjustments that the parties are continuing to discuss relating to the scheduling of depositions of individual plaintiffs who may be designated as liability trial witnesses.

The parties recognize that the schedule for the cases against National Westminster Bank may require extending the deadlines set forth in the proposed schedule in the event that defendant's summary judgment motions in the Credit Lyonnais cases are denied and those cases proceed to trial.

Hon. Marilyn D. Go, U.S.M.J.

December 4, 2008

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We thank the Court for its courtesy and consideration. Should your Honor or Chambers have any questions, please do not hesitate to contact us.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Aaron Schlanger", with a long horizontal flourish extending to the right.

Aaron Schlanger

Enclosures

cc: All Counsel

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X		
MOSES STRAUSS, et al.,	:	
	:	
Plaintiffs,	:	Case No. 06-cv-702 (CPS)(MDG)
	:	
-against-	:	
	:	
CREDIT LYONNAIS, S.A.,	:	
	:	
Defendant	:	
-----X		
BERNICE WOLF , et al.,	:	
	:	Case No. 07-cv-914 (CPS) (MDG)
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
CRÉDIT LYONNAIS, S.A.,	:	
	:	
Defendant.	:	
-----X		

[PROPOSED] SCHEDULING ORDER

Whereas, pursuant to Fed. R. Civ. P. 16 and 26(f), the plaintiffs in the above-captioned Actions and defendant Credit Lyonnais (“Defendant”) have met and agreed upon the following schedule for those cases (collectively, the “Actions”);

IT IS HEREBY ORDERED that the following schedule shall govern the Actions:

<u>Date</u>	<u>Deadline</u>
February 17, 2009	Deadline for the parties to propound written discovery requests or Letters of Request under the Hague Convention and similar procedures related to non-damages and non-expert issues other than requests for admissions related to authenticity and admissibility of documents.
March 30, 2009	Deadline for the parties to file final motions to compel relating to pending non-expert and non-damages discovery disputes.

<u>Date</u>	<u>Deadline</u>
May 8, 2009	Deadline for completion of all fact discovery not related to Plaintiffs' damages. This includes non-expert depositions, subject to production of records or identification of fact witnesses resulting from court-ordered production of records resulting from motions to compel filed prior to March 30, 2009. This does not include responses, and related production, to Letters of Request under the Hague Convention and similar procedures served on non-parties prior to February 17, 2009.
May 15, 2009	Deadline for all Plaintiffs to submit completed Plaintiff Profile Forms.
June 15, 2009	Deadline for parties to provide expert reports, other than those related to Plaintiffs' damages, pursuant to Fed. R. Civ. P. 26(a)(2)(B). Such reports will provide all information required by Rule 26.
August 14, 2009	Deadline for parties to provide expert reports of witnesses, other than those related to Plaintiffs' damages, they intend to call to testify at trial solely to contradict or rebut evidence on the same subject matter identified by another party under Fed. R. Civ. P. 26(a)(2)(B).
August 28, 2009	Deadline for the parties to serve contention interrogatories.
September 15, 2009	Deadline for serving requests for admissions related to authenticity and admissibility of documents.
October 14, 2009	Deadline for the completion of expert depositions other than those related to Plaintiffs' damages.
October 16, 2009	Deadline for the parties to respond fully to pending contention interrogatories.
October 23, 2009	Deadline for the completion of all discovery.
December 1, 2009	Deadline to file <i>Daubert</i> and dispositive motions.
January 19, 2010	Deadline to file oppositions to <i>Daubert</i> and dispositive motions.
February 19, 2010	Deadline to file reply briefs in support of <i>Daubert</i> and summary judgment motions.
April 22, 2010	Pretrial Conference on liability issues only.
	Parties to agree on a schedule for damages discovery, to begin no sooner than 20 days after a verdict for plaintiffs on liability, with a damages trial to begin within 180 and 365 days after the conclusion of the liability trial.

Dated: December __, 2008

Hon. Marilyn D. Go

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X	:	
TZVI WEISS, et al.,	:	
	:	
Plaintiffs,	:	Case No. 1:05-cv-04622 (CPS)(MDG)
	:	
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant	:	
-----X	:	
NATAN APPLEBAUM, et al.,	:	
	:	Case No. 1:07-cv-00916 (CPS) (MDG)
	:	
Plaintiffs,	:	
	:	
-against-	:	
	:	
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
-----X	:	

[PROPOSED] SCHEDULING ORDER

Whereas, pursuant to Fed. R. Civ. P. 16 and 26(f), the plaintiffs in the above-captioned Actions and defendant National Westminster Bank (“Defendant”) have met and agreed upon the following schedule for those cases (collectively, the “Actions”);

IT IS HEREBY ORDERED that the following schedule shall govern the Actions:

<u>Date</u>	<u>Deadline</u>
May 15, 2009	Deadline for all Plaintiffs to submit completed Plaintiff Profile Forms.
August 31, 2009	Deadline for the parties to propound written discovery requests or Letters of Request under the Hague Convention and similar procedures related to non-damages and non-expert issues other than requests for admissions related to authenticity and admissibility of documents.

<u>Date</u>	<u>Deadline</u>
October 23, 2009	Deadline for the parties to file final motions to compel relating to pending non-expert and non-damages discovery disputes.
December 18, 2009	Deadline for completion of all fact discovery not related to Plaintiffs' damages. This includes non-expert depositions, subject to production of records or identification of fact witnesses resulting from court-ordered production of records resulting from motions to compel filed prior to October 23, 2009. This does not include responses, and related production, to Letters of Request under the Hague Convention and similar procedures served on non-parties prior to August 31, 2009.
January 15, 2010	Deadline for parties to provide expert reports, other than those related to Plaintiffs' damages, pursuant to Fed. R. Civ. P. 26(a)(2)(B). Such reports will provide all information required by Rule 26.
March 17, 2010	Deadline for parties to provide expert reports of witnesses, other than those related to Plaintiffs' damages, they intend to call to testify at trial solely to contradict or rebut evidence on the same subject matter identified by another party under Fed. R. Civ. P. 26(a)(2)(B).
April 30, 2010	Deadline for the parties to serve contention interrogatories.
May 7, 2010	Deadline for serving requests for admissions related to authenticity and admissibility of documents.
May 25, 2010	Deadline for the completion of expert depositions other than those related to Plaintiffs' damages.
June 4, 2010	Deadline for the parties to respond fully to pending contention interrogatories.
June 11, 2010	Deadline for the completion of all discovery.
July 16, 2010	Deadline to file <i>Daubert</i> and dispositive motions.
September 3, 2010	Deadline to file oppositions to <i>Daubert</i> and dispositive motions.
October 8, 2010	Deadline to file reply briefs in support of <i>Daubert</i> and summary judgment motions.
December 8, 2010	Pretrial Conference on liability issues only.
	Parties to agree on a schedule for damages discovery, to begin no sooner than 20 days after a verdict for plaintiffs on liability, with a damages trial to begin

<u>Date</u>	<u>Deadline</u>
	within 180 and 365 days after the conclusion of the liability trial.

Dated: December __, 2008

Hon. Marilyn D. Go